

**IN THE DISTRICT COURT FOR THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)
)
)
v.) CR. No.: 2:06CR206-MHT
)
KEVIN ONEIL BROWN)

MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS

COMES NOW the Defendant, Kevin Oneil Brown, by and through counsel, William R. Blanchard, and requests an extension of time of ten (10) days to file pretrial motions. In support of this motion, undersigned counsel states:

1. Pursuant to court Order dated September 15, 2006, Mr. Brown is to file pretrial motions no later than two (2) days prior to the first pretrial conference in this case. The first pretrial conference is scheduled for September 25, 2006.
2. Undersigned defense counsel was first appointed by the Court to represent Mr. Brown on September 14, 2006. Discovery became available on the following day. Discovery consists of 256 bates-stamped pages of documents and reports.
3. Undersigned defense counsel for Mr. Brown will not have an adequate opportunity to review all discovery, confer with Mr. Brown, and research and prepare any pretrial motions which may be appropriate to the case within the time limit initially established for this case.

WHEREFORE, the Defendant prays for a ten (10) days extension of time, and that he be allowed until Monday, October 2, 2006, to file any pretrial motions in this matter.

RESPECTFULLY SUBMITTED this 22nd day of September 2006.

s/ William R. Blanchard
WILLIAM R. BLANCHARD
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CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: AUSA Chris Snyder, and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: n/a.

Respectfully submitted,

s/ William R. Blanchard
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